

MOUND COTTON WOLLAN & GREENGRASS, LLP

COUNSELLORS AT LAW
ONE NEW YORK PLAZA
NEW YORK, NY 10004-1901

NEW YORK, NY
FLORHAM PARK, NJ
GARDEN CITY, NY
SAN FRANCISCO, CA
FORT LAUDERDALE, FL

KENNETH M. LABBATE
PARTNER
212-804-4243
KLABBATE@MOUNDCOTTON.COM

(212) 804-4200
FAX: (212) 344-8066
WWW.MOUNDCOTTON.COM

November 27, 2017

VIA ECF & E-MAIL

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: *Gerard Diffley v. Bostwick Laboratories, Inc.*
Civil Action No. 17-CV-1410 (ALC)
Request For Extension of Time to Respond To Complaint

Dear Judge Carter:

We represent Defendant Bostwick Laboratories, Inc. ("Bostwick") in the above-referenced matter. We write to respectfully request that Bostwick's time to answer, move or otherwise respond to the Complaint be extended up to and including December 20, 2017. The Court's recent Order of October 13, 2017 lifted an automatic stay of these proceedings related to Bostwick's previous filing of a Suggestion of Bankruptcy but it did not specify a date by which Bostwick must respond to the Complaint. Plaintiff's counsel has consented to this request and no prior request for such an extension has been made.

Respectfully Submitted,



Kenneth M. Labbate

cc: All counsel of record via ECF